

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

FILED

AUG 25 2023 *Jc*

Allen J. Gordon

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

23-cv-6130
Judge Hunt
Magistrate Judge Kim
Random/PC4

vs.

Case no.

(To be supplied by the Clerk of this Court)

TPR Christopher E. Ethers # 6131 individual & official capacity

Ofc. Woods # 566 individual & official capacity

Sup. Martinez # 5162 individual & official capacity.

MARSHALL police Department

City of MARSHALL

ILLINOIS state police Department

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)**

**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)**

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: GORDON 22 C 3510

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

Allen Joseph Gordon

D. List all defendants: Officer Ismail Nader

Officer VICTOR Guebara

CITY OF CHICAGO

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Federal Northern District of Illinois Eastern Division

F. Name of judge to whom case was assigned: Judge Kendall

magistrate Harjani

G. Basic claim made: Plaintiff Excessive FORCE

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): still pending in negotiations

I. Approximate date of disposition: start date July 7, 2022

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ON OCTOBER 20, 2018 TPR. EHTERS #6131 officer I.D. at the location of (15860 Hwy 15860 Hwy) jp PePetrolium mobile gas pump 6 requested I exit a vechile so he may conduct a search of my person. Melvin miles, Zead Graham, Amarilis Rivera 3 the owner of the vechile (Dodge charger) ZAKIR BEG where also located in 3 around the vechile. NO search was done on them, after discovering no weapons, no drags, on my person. TPR EHTERS then began to search ZAKIR BEG Vechile 3 recovered an "firearm" black Taurus PT111 G2 9mm from an blue leather jacket he found inside the (Dodge charger) Ofc. Woods #566 of the markam police dept was on the scene as well assisting TPR. EHTERS. TPR EHTERS upon discovering the "9mm" placed only me in handcuffs 3 then placed me in his police cruiser. TPR. EHTERS then notified me, I was under arrest for "unlawful use of a weapon".

Numeras of police began showing up from the MARKAM 3 HARVEY police department to assist TPR. EHTERS 3 ofc. Woods. At 2:48 A.M TPR. EHTERS read me miranda warning.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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Miles, Graham, ZAKIR BEG & Rivera where released from the scene. NO questioning or investigation was done to find out who the firearm belong too. Tpr. EITIERS initiated arresting me and bringing criminal charges against me, maliciously. Tpr. EITIERS knew the vehicle did not belong to me. Tpr. EITIERS also knew there were four other individuals - suspects that the firearm could had belong too. Yet! NO questions where asked by him, Tpr. EITIERS had a body CAM on his person, but he did not have it on. Ofc. Woods & other members of the MARKAM & HARVEY police Department failed to act & uphold the law. TPR. EITIERS transported me to M1 squad room for processing. Once there Tpr. EITIERS contacted ASA Carolyn of cook county state attorney Felony review office.

TPR. EITIERS admantly press the official ASA Carolyn to approve the criminal complaint. Supervisor Martinez is personally involved as well, he had the opportunity to correct officers EITIERS infraction. But instead he also approved Tpr. EITIERS statement & Complaint and ofc. Woods of MARKAM police Dept. back it up.

In the circuit court of cook county Illinois, MARKAM, IL I for the next 35 months was prosecuted & for 14 of those months detained ~~in Cook County Jail~~ in Cook county Jail, with a no bond. TPR. EITIERS, Ofc. Woods & Sup. Martinez had sufficient degree of control in the initiation of the prior proceedings that had commenced. I have suffered, damages & injury due to this prosecution.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

The criminal proceedings began Oct 20, 2018 & did not conclude until September 08, 2021. I was found "Not Guilty" by 12 juror of my peers. CASE number 18CR1593101

SIO Number 052929220

IR Number 1758467

I am bringing my Complaint against

- Tpr. EHTERS # 6131 malicious prosecution & pre-trial unlawful detention violating my 4th amendment Constitutional rights
- Ofc. Woods # 566
- Sup. Martinez # 5162
- I am also bringing suit against markham police Department and the City of markham for BAD TRAINING & BAD HIRING.
- I am also bringing suit against the Illinois state police Department for Bad training & hiring
- * I seek indemnification from the markham police Department, the city of markham and the Illinois state police for the reasons listed above.

This case did not conclude until Sept. 08, 2021, so I am within the 2 year period to bring a lawful suit against these person's and entities for malicious prosecution & Unlawful pre-trial Detention.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Relief Compensatory Damages - Monetary

- Lost of income (Job)
- Cost of defense
- Loss Apt became homeless unable to afford my rent
- mental & emotional distress due to homelessness
- All this while the covid-19 pandemic was going on

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 17 day of Aug, 2023

Allen J. Gordan
(Signature of plaintiff or plaintiffs)

Allen J. Gordan
(Print name)

NIA
(I.D. Number)

1416 E. 68th Street Apt 3w

Chicago, IL 60637
(Address)